

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In RE: Leonard S. Bergman Michele J. Bergman Debtors	Case No.:20-12276-MDC Chapter 13
William C. Miller, Esq. Chapter 13 Trustee Movant	Hearing Date:10/1/2020 Hearing Time: 09:30 A.M.

**DEBTOR'S RESPONSE TO MOTION TO DISMISS OF WILLIAM C. MILLER, ESQ.,  
CHAPTER 13 TRUSTEE**

To the Honorable Judge of the United States Bankruptcy Court for the Eastern of Pennsylvania:

The Debtor in this matter, Leonard S. Bergman and Michele J. Bergman, by counsel, responds to the Trustee's Motion to Dismiss as follows:

1. Debtor objects to the secured claims filed in this case. Debtors are attempting to amicably resolve the disputed arrears amount with the creditors.
2. Creditors are not prejudiced in that the Debtor continues to pay ongoing debt as they become due. Debtors are working to settle the disputed claims with creditors prior to the confirmation of the plan.
3. Debtors will amend plan if necessary.

WHEREFORE, Debtor prays that the Trustee's motion be dismissed.

Date: 9/12/2020

/s/ Robert N. Kim  
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